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ANNE GOODWIN CRUMP\* VINCENT J. CURTIS, JR. THOMAS J. DOUGHERTY, JR. JAMES G. ENNIS PAUL J. FELDMAN\*

## FLETCHER, HEALD & HILDRETH

(1936-1962) FRANK ROBERSON (1936-1961) RECFIVE ATTORNEYS AT LAW V<sub>1</sub> L. 1

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BEFORE THE

MAY 27 1993

## Federal Communications Commission

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

WASHINGTON, D.C. 20554

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	In re Applications of  CONCORD-CARLISLE REGIONAL SCHOOL DISTRICT (WIQH) Concord, Massachusetts	) ) )	MM DOCKET NO. 93-115 File No. BPED-860424MC
	TECHNOLOGY BROADCASTING	) 	File No. BPED-920326IA
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requested by the parties. Although no affirmative procedural date established by the Presiding Judge in the <u>Order</u> arrives until June 7, 1993, the 30-day suspension period requested by the parties ends on May 29, 1993.

- 2. In the Request, the Parties advised the Presiding Judge that the Parties were participating in ongoing discussions with the Bureau concerning the Bureau's willingness to consent to or support a request by Concord for waiver of Section 73.509 of the Commission's Rules. The Parties and the Bureau now have reached an oral understanding that the Bureau will support such a waiver, negating the need for a hearing should the Presiding Judge agree to the waiver. Out of an abundance of caution, the Parties, however, requests an extension of the suspension period in order to provide adequate time to properly prepare and file a petition for leave to amend and an amendment requesting the waiver.
- 3. Good cause exists for this request. The Petition for Leave to Amend and Amendment, if granted by the Presiding Judge, will eliminate the mutual exclusivity between the Parties' proposals, obviate the need for a comparative hearing in this proceeding, and allow both noncommercial licensees to upgrade their facilities to provide expanded noncommercial educational service to the public. Eliminating the need for a hearing would save the scarce time and resources of the Commission and these noncommercial applicants. Since the Parties are operating facilities, the additional suspension would not result in a delay in the commencement of service to the public. Furthermore, no adverse

disruption or delay in the proceeding would result from the requested extension of time since the extension would terminate on the first date by which the Parties have an affirmative obligation to act under the procedural dates established by the Presiding Judge.

WHEREFORE, in light of the foregoing, Concord-Carlisle Regional School District respectfully requests the Presiding Judge to grant an additional suspension of the procedural dates in this proceeding until June 7, 1993.

Respectfully submitted, CONCORD-CARLISLE REGIONAL SCHOOL DISTRICT

FLETCHER, HEALD & HILDRETH 1300 North 17th Street 11th Floor Rosslyn, VA 22209 (703) 812-0400 By Millia May Howard M. Weiss Kathleen Victory

TECHNOLOGY BROADCASTING CORPORATION

SCHWARTZ WOODS & MILLER 1350 Connecticut Ave., NW Suite 300 Washington DC 20036 (202) 833-1700

May 27, 1993

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## CERTIFICATE OF SERVICE

I, Roberta Wadsworth, a secretary in the law firm of Fletcher, Heald & Hildreth, hereby certify that I have on this 27th day of May, 1993, had copies of the foregoing "REQUEST FOR EXTENSION OF TIME" mailed by U.S. Mail first class, postage prepaid, to the following:

> \*Honorable Joseph Chachkin Administrative Law Judge Federal Communications Commission 2000 L Street, N.W., Room 226 Washington DC, 20554

\*Paulette Laden, Esquire Hearing Branch Enforcement Division, Mass Media Bureau Federal Communications Commission 2025 M. Street, N.W., Room 7212 Washington, DC 20554

\* denotes hand delivery